

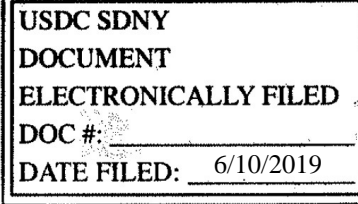
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- against -

CHRISTOPHER COLLINS, et al.,

Defendants.



18-CR-567 (VSB)

ORDER

VERNON S. BRODERICK, United States District Judge:

Before me are motions for a orders directing (1) release of materials related to the Speech or Debate Clause of the United States Constitution, brought by Defendant Christopher Collins, and (2) release of *Brady* materials and Rule 16 materials, brought by all Defendants. (Docs. 62, 64.) I held oral argument on May 3 and 10, 2019 related these motions after issuing an Order on May 1, 2019, outlining questions to be addressed during oral argument. To facilitate my consideration of these motions, the Government shall provide the Court with answers to the following questions or copies of the requested materials on or before June 14, 2019. If the documents requested involve materials covered by Rule 6(e) of the Federal Rules of Criminal Procedure they should only be submitted to the Court for review in camera.

Brady/Rule 16 Materials

- 1) What, if anything, were witnesses who were interviewed by the United States Attorney's Office for the Southern District of New York ("USAO SDNY") and the Securities and Exchange Commission ("SEC") told concerning whether the investigations were being conducted jointly, in parallel, or separately?

- 2) What agency was responsible for setting up the interviews? If that varied, how many interviews were arranged by the USAO SDNY and how many were arranged by the SEC?
- 3) At whose offices were the interviews held? If that varied, how many interviews were held at the USAO SDNY and how many were held at the SEC?
- 4) Were there proffer agreements used during the interviews? If so, did the USAO SDNY and the SEC use the same agreement or separate agreements?
- 5) During oral argument on May 3 the Government stated that “They did an action memo as I understand it, but we haven’t seen it.” Does the “we” refer to the members of the prosecution team or anyone from the USAO SDNY or both?

Grand Jury Related Materials

- 1) The number of witnesses who testified during the Grand Jury presentation that led to the Indictment.
- 2) The total number of transcript pages of the Grand Jury presentation that led to the Indictment (excluding exhibits).
- 3) The total number of exhibits admitted during the Grand Jury presentation that led to the Indictment.
- 4) The transcript of the Grand Jury testimony of any current or former staff members of Defendant Christopher Collins.
- 5) The transcript pages of Grand Jury testimony of any agent or other witness that recounted statements made by current or former staff members of Defendant Christopher Collins.
- 6) Copies of Grand Jury exhibits and/or materials shown to the Grand Jury seized from

(either through use of a search warrant or a subpoena) or voluntarily produced by current or former staff members of Defendant Christopher Collins.

- 7) Copies of Grand Jury exhibits and/or materials shown to the Grand Jury related to the investigation of Defendant Christopher Collins by the U.S. House of Representatives Office of Congressional Ethics.
- 8) Copies of Grand Jury exhibits and/or materials shown to the Grand Jury related to the U.S. House of Representatives.

SO ORDERED.

Dated: June 10, 2019
New York, New York


Vernon S. Broderick
United States District Judge